

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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KRISTIN MERONE,

Plaintiff,

-against-

CITY OF NEW YORK and DANIEL G. GARCIA,

Defendants.  
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**NOTICE OF  
DEFENDANTS CITY  
AND GARCIA'S  
MOTION FOR  
SUMMARY JUDGMENT  
PURSUANT TO FED. R.  
CIV. P. 56**

24-CV-8730 (BMC)

**PLEASE TAKE NOTICE** that upon defendants the City of New York and Daniel G. Garcia's Memorandum of Law dated August 25, 2025, the Declaration of Senior Counsel Zachary Kalmbach dated August 25, 2025, and the exhibits annexed thereto, the annexed Local Rule 56.1 Statement, and upon all prior pleadings and proceedings had herein, defendants the City of New York and Daniel G. Garcia will move this Court, before the Honorable Brian M. Cogan, United States District Judge, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be determined by the Court, for an Order, pursuant to Fed. R. Civ. P. 56 granting summary judgment in favor of defendants the City of New York and Daniel G. Garcia and dismissing this action in its entirety, together with such other relief as the Court deems just and proper;

**PLEASE TAKE FURTHER NOTICE** that plaintiff's opposition papers shall be filed on or before September 24, 2025 (See Docket Entry Dated July 24, 2025); and

**PLEASE TAKE FURTHER NOTICE** that defendants the City of New York and Daniel G. Garcia shall file their reply papers, if any, on or before October 6, 2025 (Id.).

Dated: New York, New York  
August 25, 2025

MURIEL GOODE-TRUFANT  
Corporation Counsel of the  
City of New York  
*Attorney for Defendants City and Garcia*  
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By: /s/ *Zachary Kalmbach*  
Zachary Kalmbach  
*Senior Counsel*

TO: Via ECF  
All counsel of record